

## COMPARISON OF PROPOSED AND FINAL STATE MERCURY EMISSION STANDARDS FOR POWER PLANTS

April 6, 2004

Issue	MA	CT	WI	NJ
Stringency of Standard	<p>Cap emissions at 2001 -2002 levels</p> <p>Phase I -85% control efficiency or 0.0075 lbs/GWH.</p> <p>Phase II -95% control efficiency or 0.0025 lbs/GWH.</p> <p>(equivalent to approx. 0.2 lbs/TBTU</p>	<p>No caps.</p> <p>0.6 lbs/TBTU or 90% control efficiency.</p>	<p>Cap on emissions in 2008: current control efficiency x baseline (3 yr. Mercury coal average)</p> <p>Phase I - 40 % reduction from coal</p> <p>Phase II - 80% reduction from coal.</p>	<p>No caps</p> <p>3.00 mg/MW- hr; <b>or</b> 90 percent control of mercury emissions; (equivalent to 0.6 lbs/Tbtu)</p>
Format of Standard	Either/or output-based emissions rate or percent reduction from input levels	Either/or heat input-based emission rate or percent reduction from input levels	Percent reduction from input levels	Output-based emissions rate or percent reduction from input levels
Compliance Deadline	<p>Phase I - October 1, 2006</p> <p>Phase II - October 1, 2012</p> <p>(To coincide with SO2 requirements)</p>	July 2008	<p>Phase I - 2010</p> <p>Phase II - 2015</p>	<p>December 15, 2007 if only control mercury</p> <p>Multipollutant Option</p> <p>Phase I - December 15, 2007 (50%)</p> <p>Phase II - December 15, 2012 (Final compliance)</p>
Compliance Monitoring	CEMs effective January 1, 2008	CEMs when validated by USEPA	Annual (fuel use x Hg content)	Stack testing or CEMs when validated by USEPA
Frequency of Stack Testing	Quarterly with frequency reduced to 4 of 5 quarters after compliance demonstrated each quarter for 2 years.	Quarterly with phaseout of stack tests after CEMs are employed	Annual	Quarterly with phaseout of stack tests after CEMs are employed
Other	Draft allows "off-site" reductions to provide initial flexibility; expires December 2009	Alternative limit can be developed if technology proven infeasible. Stricter standard may also be issued	Phase I waived if multipollutant approach taken. Variances for reliability, technical or economic infeasibility included. Trading among 4 utilities allowed.	Compliance deadline extended to December 15, 2012 - if an enforceable agreement with the Department by December 15, 2007, to install and operate multi-pollutant control systems by December 15, 2012;